

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division**

In Re:
Clifford E. Hoskins, Sr. and Hoskins L. Janet
Debtor(s)

Case No.: 11-30308
Chapter: 7
Adversary No.: 12-00023
Judge: David E. Rice

Plaintiff(s)
GE Money Bank

vs.

Defendant(s)
Janet Linda Hoskins

CONSENT MOTION TO EXTEND DEADLINE TO ANSWER
COMPLAINT OBJECTING TO DISCHARGE OF DEBT

Janet Linda Hoskins, Defendant in the case captioned above, by and through her attorney Daniel S. Rosefelt, Esquire, and Fried & Rosefelt, LLC, with the consent of GE Money Bank, Plaintiff in the case captioned above, by and through its attorney, Kevin M. Fitzpatrick, Esquire and The Fitzpatrick Law Office, P.C. move for this Court to enter an order extending the time for Defendant to answer the Complaint filed in this matter until February 20, 2012.

The parties in this matter are currently engaged in the process of ongoing settlement negotiations. The parties in this matter agree that an extension of the time deadline for Defendant to answer the Complaint filed in this matter may result in a settlement of the case and such extension will be in the interest of the parties and the judicial economy of this Court.

WHEREFORE, Defendant, with the consent of Plaintiff, move that this Court extend the deadline for Defendant to answer the Complaint in this matter until February 20, 2012

Date: February 13, 2012

Respectfully submitted,

/s/ Daniel S. Rosefelt

Daniel S. Rosefelt, Esquire
USDC-MD Bar No. 15003
FRIED & ROSEFELT, LLC.
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Suite 925 West
Bethesda, Maryland 20814
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Attorney for Defendant Janet L. Hoskins

With the Consent of:

/s/ Kevin M. Fitzpatrick

Kevin M. Fitzpatrick Esquire
The Fitzpatrick Law Office, P.C.
4118 Leonard Drive, Suite 200
Fairfax, VA 22030
Telephone: (703) 352-7150
Email: kevin@fitzlaw.biz

Attorney for GE Money Bank.

Certificate of Service

I, Daniel S. Rosefelt, hereby certify that on February 13, 2012, copies of the foregoing Consent Motion to Extend Deadline to Answer Complaint Objecting To Discharge of Debt and Proposed Order thereon were served electronically by the Court's CM/ECF system to all parties authorized to receive such service and by first class mail, postage prepaid to the parties listed below.

Kevin M. Fitzpatrick Esquire
The Fitzpatrick Law Office, P.C.
4118 Leonard Drive, Suite 200

/s/ Daniel S. Rosefelt
Daniel S. Rosefelt, Esquire

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Plaintiff(s)
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**CONSENT ORDER GRANTING MOTION TO EXTEND DEADLINE
TO ANSWER COMPLAINT OBJECTING TO DISCHARGE OF DEBT**

Having considered the Consent Motion to Extend the Deadline for the Defendant to answer the Complaint filed in this matter, and the consent of the parties as subscribed below, it is hereby

ORDERED, that the Defendant shall have until February 20, 2012, to file an answer to the Complaint filed by Plaintiff in this matter.

Approved as to form and content:

/s/ Daniel S. Rosefelt

Daniel S. Rosefelt, Esquire
Fried & Rosefelt, LLC
USDC-MD Bar No. 15003
Attorney for Defendant
Janet L. Hoskins

/s/ Kevin M. Fitzpatrick

Kevin M. Fitzpatrick Esquire
The Fitzpatrick Law Office, P.C.
4118 Leonard Drive, Suite 200
Fairfax, VA 22030

I HEREBY CERTIFY that the terms of the copy of the Consent Order submitted to the Court are identical to those set forth in the original Consent Order; and the signatures represented by the /s/ on the copy of the Consent Order submitted to the Court reference the signatures of consenting parties obtained on the original Consent Order.

/s/ Daniel S. Rosefelt

Daniel S. Rosefelt, Esquire

END OF ORDER